

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 1:24-bk-03264-HWV  
IRENE PAPOUTSIS MULKERIN :  
Debtor : Chapter 7  
:

**OBJECTION OF THE PAPOUTSIS FAMILY LIMITED PARTNERSHIP TO  
DEBTOR'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

The Objection of The Papoutsis Family Limited Partnership ("FLP") to the Motion (the "Motion") of Irene Papoutsis Mulkerin ("Debtor") to Compel Production of Documents (Dkt. 463), is as follows:

1. The FLP is a Limited Family Partnership in which the Debtor, pre-petition, owned a Limited Partnership interest.
2. Because of the Debtor's interest in the FLP as Limited Partner, such Limited Partnership Interest is property of the Debtor's estate.
3. Until such time as a determination is made by the Trustee as to what action he intends to take concerning the FLP interest of the Debtor, only the Debtor has the right to any documents concerning the FLP, including any business records or tax returns.
4. The FLP has issued all K-1's required to be issued to each of the Partners of the FLP. Such were filed in a sufficient amount of time for each Limited Partner to utilize such K-1 in the filing of their personal tax returns.
5. The K-1 contains sufficient information for the Debtor to file her tax return.
6. The sole purpose which the Debtor has alleged as to why she needs to look at business records is for purposes of filing tax returns. As set forth above, such review of records is not necessary. If and when the Chapter 7 Trustee determines not to administer

the FLP interest, in the name of the Debtor, the FLP will provide such records to the Debtor as is required by the Partnership Agreement.

**WHEREFORE**, the Papoutsis Family Limited Partnership requests that the Motion be denied.

Respectfully submitted:

CUNNINGHAM, CHERNICOFF  
& WARSHAWSKY, P.C.

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